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Attorneys for Defendants
Philippe Ziade, Jude Nassar, Appleton
Properties, LLC, Z Leb Group, LLC,
Progressive Construction, Inc., Growth
Development, LLC, Vibrant Realty, LLC,
AJ Properties International, LLC, AJ Properties
International Series 2, LLC, Growth Holdings,
LLC, Growth Luxury Homes, LLC, and
Growth Luxury Realty, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Nikkei Global Inc., a California corporation,

Plaintiff,

vs.

Co-Partner Consortium ("Partner-CO"), a
Nevada general partnership associated in fact
and as an enterprise per 18 USCA § 1961(3);
Mr. Phillip Ziade, Nevada resident and co-
partner; Mr. Jude E. Nassar, an individual
resident of Clark County, Nevada; Appleton
Properties, LLC, a Nevada limited liability
company; Z Leb Group, LLC, a Nevada limited
liability company; Progressive Construction,
Inc. a/k/a Growth Construction, a Nevada
corporation; Growth Development, LLC a/k/a
Growth Construction, a Nevada limited liability
company; Vibrant Realty, LLC, a Nevada
limited liability company; AJ Properties
International, LLC, a/k/a AJ1, a Nevada limited
liability company; AJ Properties International
Series 2 LLC, a/k/a AJ2, a Nevada limited

Case No. 2:18-cv-02013-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND RESPONSE DATE TO FIRST
AMENDED COMPLAINT (ECF 39)**

(Second Request)

liability company; Growth Holdings, a Nevada corporation; Growth Luxury Homes, LLC, a/k/a GLH, a Nevada limited liability company; Growth Luxury Realty, LLC, a/k/a GLR, a Nevada limited liability company; Mr. Yoshimi Hirooka, a resident of Japan or Singapore, doing business in Nevada; Mr. Yoshihiro Hirooka, a resident of Japan or Singapore doing business in Nevada; Hirooka Family Office, Ltd., a foreign organization doing business in Nevada,

Defendants.

Plaintiff Nikkei Global Inc. (“Nikkei”), and Defendants Philippe Ziade, Jude Nassar, Appleton Properties, LLC, Z Leb Group, LLC, Progressive Construction, Inc., Growth Development, LLC, Vibrant Realty, LLC, AJ Properties International, LLC, AJ Properties International Series 2, LLC, Growth Holdings, LLC, Growth Luxury Homes, LLC, and Growth Luxury Realty, LLC (collectively, “Growth”), by and through their respective counsel, stipulate and agree as follows:

1. On October 18, 2018, Nikkei filed its Complaint [ECF 1] (the “Complaint”).
2. On November 19, 2018, Growth accepted service of the Complaint.
3. On January 4, 2019, Growth filed a Motion to Dismiss the Complaint [ECF 23].
4. On January 25, 2019, Nikkei filed a First Amended Complaint [ECF 39], which is permitted one time as a matter of course. *See* Fed. R. Civ. P. 15(a)(1)(B).
5. Due to the filing of the First Amended Complaint, Growth and Nikkei previously agreed, and the Court ordered, a withdrawal of the pending Motion to Dismiss because it had been mooted, in part, by Nikkei’s filing of the First Amended Complaint [ECF 40].
6. Growth and Nikkei previously agreed, and the Court ordered, that Growth shall have up to and until March 8, 2019 to respond to the First Amended Complaint [ECF 40].
7. Due to scheduling issues, Growth has requested a one week extension to the prior deadline, and that Growth shall have up to and until March 15, 2019 to respond to the First Amended Complaint.
8. Nikkei is still in the process of serving the Hirooka Co-Defendants pursuant to the terms of the Hague Convention [ECF 25; ECF 27], and therefore, a one week extension will not

1 result in any delay.

2 9. This is the second stipulation to extend the deadline to file a response to the First
3 Amended Complaint. This stipulation is made in good faith and not to delay the proceedings.

4 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

5 DATED this 5th day of March, 2019.

DATED this 5th day of March, 2019.

6 WILSON, ELSER, MOSKOWITZ,
7 EDELMAN & DICKER LLP

BAILEY ♦ KENNEDY

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Attorneys for Growth

Attorneys for Plaintiff Nikkei Global Inc.

12 IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

15 DATED: March 6, 2019